

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

AMO DEVELOPMENT, LLC,)	
AMO MANUFACTURING USA, LLC,)	
and AMO SALES AND SERVICE,)	
INC.,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 20-842-CFC-JLH
)	
ALCON VISION, LLC, ALCON)	JURY TRIAL DEMANDED
LABORATORIES, INC., and ALCON)	
RESEARCH, LLC,)	
)	
Defendants.)	
)	
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ALCON, INC., ALCON RESEARCH,)	
LLC and ALCON VISION, LLC,)	
)	
Counterclaim-Plaintiffs,)	
)	
v.)	
)	
AMO DEVELOPMENT, LLC,)	
AMO MANUFACTURING USA, LLC,)	
AMO SALES AND SERVICE, INC.)	
and JOHNSON & JOHNSON)	
SURGICAL VISION, INC.,)	
)	
Counterclaim-Defendants.)	
)	

**ALCON'S MOTION FOR SUMMARY JUDGMENT (NO. 1) THAT THE
COPYRIGHT ACT BARS MONETARY RELIEF FOR INFRINGING ACTS
OCCURRING MORE THAN THREE YEARS BEFORE J&J FILED SUIT**

Pursuant to Federal Rule of Civil Procedure 56, Defendants Alcon Vision, LLC, Alcon Laboratories, Inc., and Alcon Research, LLC (“Alcon”) respectfully move for summary judgment on Plaintiffs AMO Development, LLC, AMO Manufacturing USA, LLC, and AMO Sales and Service, Inc.’s (“J&J”) claim for monetary relief for acts that occurred before September 28, 2017. The grounds for this motion are fully set forth in Alcon’s Brief in Support of its Motion for Summary Judgment (No. 1) That the Copyright Act Bars Monetary Relief for Infringing Acts Occurring More Than Three Years Before J&J Filed Suit, and a proposed order is attached hereto.

WHEREFORE, Alcon respectfully requests that the Court grant this Motion and enter the proposed order attached hereto.

Respectfully Submitted,

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